

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ALEJANDRO MORALES, *on behalf of  
himself and those similarly situated,*

Plaintiff,

vs.

HEALTHCARE REVENUE  
RECOVERY GROUP, LLC, and JOHN  
DOES 1 to 10,

Defendants.

Case No. 2:15-cv-08401-EP-JBC

**DECLARATION OF ALEJANDRO  
MORALES IN SUPPORT OF  
MOTION FOR CLASS  
CERTIFICATION**

I, **ALEJANDRO MORALES**, being of full age, declare as follows:

1. I am the named Plaintiff and proposed class representative in the above-captioned matter. I am over 18 years of age and I have personal firsthand knowledge of the facts contained herein. If called upon to do so, I could and would competently and truthfully testify to the same under oath.

2. As written in the operative Complaint (ECF No. 1), in an attempt to collect on an alleged debt arising out of the provision of healthcare services, Defendant Healthcare Revenue Recovery Group, LLC (“HRRG”) mailed me a collection letter dated December 3, 2014. *See* Compl. ¶ 19, ECF No. 1.

3. A true, but redacted copy of the December 3, 2014 letter is attached as “Exhibit A” to my Complaint (ECF No. 1-1).

4. My Complaint alleges that when Defendants sent the December 3, 2014, letter to me, Defendant used an envelope with a glassine window, which visibly displayed a barcode containing the account number associated with my alleged debt. Compl. ¶¶ 22-24.

5. I understand that my class action lawsuit alleges Defendant violated a federal law known as the Fair Debt Collection Practices Act (15 U.S.C. § 1692 *et seq.*), which prohibits debt collectors like Defendant from using any language or symbol, other than the debt collector's address, on any envelope when communicating with a consumer by mail.

6. I understand that a class action is a lawsuit brought by at least one person (in this case, me) on behalf of a group of people who have been treated in the same manner. Here, that similar manner includes that the other class members received a collection letter from HRRG that was sent in a windowed envelope such that the barcode containing the account number associated with the debt was visible from outside the envelope.

7. I have been, and I remain, willing and able to serve as a representative of the class. To that end, I understand:

- a. That as a class representative, I have the responsibility to see that my lawyers prosecute the case on behalf of the entire Class;

- b. I have already sat for a deposition in this matter on January 13, 2017, and provided documents and information for use in my case, and I am willing and able to testify at trial if needed;
- c. That my lawsuit cannot be dropped or settled without protecting the Class members, which normally means that the other members of the Class must receive notice of any settlement and afforded a fair opportunity to exclude themselves from the case; and
- d. That the Court must approve any settlement or disposition on behalf of the Class alleged in my Complaint (or that is ultimately approved by the Court).

8. I retained my attorneys and have arranged for them to advance all costs related to this action, including the cost of class notification. I have been actively involved in this litigation since it was filed; I have stayed in active communication with my lawyers about all aspects of my case and followed their advice.

9. I support my attorneys' request to be confirmed as class counsel for purposes of this action.

10. I am unaware of any legal differences in my status as a Class Member from the other Class Members, nor of any unique factual issues pertaining to such representative status, which must be litigated. To my knowledge, I have no

interests which are or would be in conflict with interests of the other Class Members.

11. The claims which I have asserted arising in the Complaint seem to be the same as the claims of the other class members.

12. I have not been promised or guaranteed money for serving as the class representative.

13. I understand the obligations for serving as class representative including that I have and will continue to represent the interests of the class with the advice of my attorneys.

14. I am unaware of any interests antagonistic to the class.

15. I am not employed by or related to my attorneys at the Kim Law Firm LLC. My attorneys will be paid as directed by the Court, if the case is successful, out of Defendant's assets and/or the funds recovered for the class.

*In accordance with 28 U.S.C. § 1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.*

Executed on: November 7, 2022



ALEJANDRO MORALES